

Illinois Environmental Protection Agency  
Bureau of Air, Permit Section  
1021 N. Grand Avenue East  
P.O. Box 19506  
Springfield, Illinois 62794-9506

Project Summary for an Application from  
Gonnella Baking Company for Renewal of  
The Federally Enforceable State Operating Permit (FESOP) for  
1001 West Chicago Avenue, Chicago

Site Identification No.: 031600CIJ  
Application No.: 98070014

Schedule

Public Comment Period Begins: July 3, 2014  
Public Comment Period Closes: August 2, 2014

Illinois EPA Contacts

Permit Analyst: Valeriy Brodsky  
Community Relations Coordinator: Brad Frost  
217/782-7027  
Brad.frost@illinois.gov

## **I. INTRODUCTION**

Gonella Baking Company currently operates under federally enforceable state operating permit (FESOP) which expired . The company requested a renewal of their FESOP to continue to operate as non-major source for the purposes of the Clean Air Act Permit Program (CAAPP). Production and emission limitations, as well as monitoring and recordkeeping conditions contained in the FESOP have prevented the facility from being a major source and will assure this status in the future. These conditions would be enforceable by both the State of Illinois and USEPA.

## **II. SOURCE DESCRIPTION**

Gonella Baking Company produces bread dough products. The dough is prepared by mixing flour, water, yeast, salt, sugar. The dough is shaped and then goes to proof boxes for leavening, i.e., the yeast causes the dough to rise. The dough is then baked in the gas fired ovens, packaged and shipped. Gonella Baking Company operates two natural gas-fired baking ovens. All flour handling processes are controlled with filters.

## **III. GENERAL DISCUSSION**

Federally Enforceable State Operating Permits (FESOPs) are federally enforceable, that is, the terms and conditions of the permits can be enforced by USEPA under federal law, as well as by Illinois government and the public under state law. These permits can establish federally enforceable limitations on the operation and emissions of a source that restrict the potential emissions of the source.

The source has to operate this plant under a FESOP because the actual emissions of the plant are below the levels at which the plant would be considered a major source under Title V and Title I of the Clean Air Act and regulations promulgated thereunder, including 35 IAC Part 203 - Major Stationary Sources Construction and Modification. However, in the absence of federally enforceable limitations, the plant's potential emissions would be such that the plant would be considered a major source for both programs. The permit acts to restrict the plant potential emissions so that it need not be considered a major source. As a result, the source does not need to obtain a Clean Air Act Permit Program (CAAPP) permit for the plant, as would otherwise be required.

The federally enforceable limitations of the annual seasonal VOM emissions also allow the source to be exempt from participation in the Emissions Reduction Market System (ERMS).

The FESOP limits the operation and annual emissions of the plant to below the major-source-thresholds of 100 tons per year of VOM emission.

## **IV. APPLICABLE EMISSION STANDARDS**

All emission units in Illinois must comply with state emission standards adopted by the Illinois Pollution Control Board. These emission standards represent the basic requirements for sources in Illinois. The source VOM emissions are subject to the general VOM emission limitation found in 35 IAC 218.301 – Use of Organic Material.

The emissions of particulate Matter (PM) are regulated by general requirements of 35 IAC, Part 212, e.g., Sections 212.123, 212.301, etc..

The application shows that the plant is in compliance with applicable state and federal emission standards.

## **V. CONTENTS OF THE PERMIT**

The permit that the Illinois EPA is proposing to issue identifies the specific emission standards that apply to the emission units at the plant. As explained, the baking ovens are subject to 35 IAC 218.301, which restricts VOM emissions from any emission unit to less than 8 lb/hr. The conditions of this permit are intended to ensure that the source continues to comply with applicable emission standards.

The permit would also contain limitations and requirements to assure that this plant is operated as a non-major source. The permit would limit the operation and annual emissions of the plant to below the major source threshold level of 100 tons for VOM. (Annual emissions of other pollutants from the plant are well below the 100 ton major source threshold.)

The permit conditions would also continue to require appropriate compliance procedures, including inspection practices as well as recordkeeping and reporting requirements. The source must carry out these procedures on an on-going basis to demonstrate that the plant is being operated within the limitations set by the permit and the plant's emissions are being properly controlled.

## **VI. REQUEST FOR COMMENTS**

It is the Illinois EPA's preliminary determination that the source has met the requirements for renewal of its permit. The Illinois EPA is therefore proposing to renew the permit.

Comments are requested on this proposed action by the Illinois EPA and the proposed conditions on the draft permit. If substantial public interest is shown in this matter, the Illinois EPA will consider holding a public hearing in accordance with 35 IAC Part 166.